

EXHIBIT 3

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TENNESSEE
3 AT WINCHESTER

4 BIANCA CLAYBORNE,)
5 individually and as parent)
6 and next friend of minors J.C.)
7 D.W., L.W., A.C., and P.C.)
8 Plaintiff,)
9 VS.)
10 RUBEN BASALDUA, et al,)
11 Defendants.)
12 X

Case No. 4:24-cv-00012
Judge Clifton L. Corker

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16 VIDEOTAPED DEPOSITION OF SHEILA YOUNGLOVE

17 TAKEN ON DECEMBER 11, 2024
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1 Ms. Clayborne and her children; is that right?

2 A. That's correct, but that is also what happens
3 in a lot of cases because the court isn't always open
4 when we need to take children into custody on an
5 emergency basis.

6 Q. So let's back up about that. On the date
7 that Ms. Clayborne and her children had this incident,
8 it was a Friday; is that right?

9 A. I think it was.

10 Q. And was the court closed for any reason?

11 A. I don't recall if they were.

12 Q. It was during normal business hours?

13 A. Right. I don't recall there being any reason
14 they would have been closed at that moment.

15 Q. So if the court is open and it's a normal
16 business day, the typical procedure would be petition,
17 hearing, order, correct?

18 A. Yes, ma'am, unless you have an emergency
19 basis.

20 Q. And so in this case, there was not the
21 typical order of things. It didn't go petition,
22 hearing, order; is that right?

23 A. Correct.

24 Q. In fact, there wasn't a petition filed
25 initially?

1 A. Okay.

2 Q. Is that right?

3 A. I don't think it was filed at the exact same

4 time.

5 Q. And there wasn't actually a hearing?

6 A. No.

7 Q. But then, all of a sudden, there's an order?

8 A. There is an ex parte order.

9 Q. And have you ever done anything in that order

10 --

11 A. Yes.

12 Q. -- before?

13 A. Yes.

14 Q. When?

15 A. It frequently happens. You get ex parte

16 orders on cases.

17 Q. And you don't file a petition for those ex

18 parte orders?

19 A. You do.

20 Q. Do you file it first?

21 A. You file it simultaneously.

22 Q. With the proposed order?

23 A. Yes.

24 Q. In this case, did you file the petition and

25 the proposed order simultaneously?

1 investigation or discovery. And you were certifying
2 that when you signed this document?

3 A. I did.

4 Q. Let's go back to the first page of this
5 order. That would be 8527. And the caption -- there's
6 blank spaces for the respondents because you didn't know
7 their name; is that right?

8 A. Correct.

9 Q. And it says that they were removed into DCS
10 custody February 17th, 2023 at approximately 3:00 p.m.?

11 A. Correct.

12 Q. So to your knowledge, when you submitted this
13 ex parte protective custody order to the judge, the
14 children had already been removed?

15 A. I believe they had.

16 Q. Because it says removed. It doesn't say plan
17 to be removed. It says removed?

18 A. Right.

19 Q. But to your knowledge, there was not a
20 written order from the judge prior to the children being
21 removed?

22 A. No, ma'am.

23 Q. The section where you put the children's name
24 here is also blank; is that right?

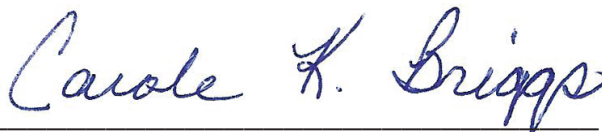
25 A. Correct.

CERTIFICATE

I, CAROLE K. BRIGGS, Licensed Court Reporter
within and for the State of Tennessee, do hereby certify
that the above deposition was reported by me and that
the foregoing pages of the transcript is a true and
accurate record to the best of my knowledge, skills, and
ability.

I further certify that I am not a relative,
counsel or attorney of either party nor employed by any
of the parties in this case or otherwise interested in
the event of this action.

IN WITNESS WHEREOF, I have hereunto affixed my
official hand on this 2nd day of January 2025.

A handwritten signature in blue ink that reads "Carole K. Briggs". The signature is written in a cursive style and is positioned above a horizontal line.

CAROLE K. BRIGGS
Shorthand Reporter
Tennessee License No. 345